

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1

Applicant Name: Shon R. Edwards

Proceeding Name: 98-143

Author Name:

Lawfirm Name:

Contact Name: applicant_name

Contact Email: ab7xt@ucares.org

Address Line 1: 184 N. 700 W.

Address Line 2:

City: Spanish Fork

State: UT ☒

Zip Code: 84660 Postal Code:

Submission Type: CO ☒

Submission Status: ACCEPTED ☒

Viewing Status: UNRESTRICTED ☒

Subject:

DA Number:

Exparte Late Filed: File Number:

Calendar Date Filed: 08/19/1998 11:49:13 AM

Date Disseminated:

Filed From: INTERNET

Official Date Filed: 08/19/1998

Date Released/Denied:

Initials:

Confirmation # 1998819353918

Date Filed:

DOCKET FILE COPY ORIGINAL

INTERNET FILING

98-143

8/19/98

Regarding the Morse Code problem (i.e., should it be gotten rid of, since ham radio is dying and technology has exceeds what Morse Code can do, or is it still a legitimate form of communication and should it still be an international requirement in Amateur Radio licensing), one possible solution might be to ALLOW CODELESS LICENSES AT DIFFERENT LEVELS of licenses (at least for Technician and General, possibly also for Advanced grades), but with more restricted privileges.

There are two extreme camps at the moment: Code and No Code. Perhaps with a compromise, amateur radio would continue to grow a little bit more with codeless options of licenses, as well as keeping the code and giving more privileges for those who master it, thus pacifying the Code camp of thought.

For example, there could be an "Advanced Code Plus License" and an "Advanced Codeless License." All presently existing exclusive Advanced privileges (i.e., 3775-3850 kHz on 80 m, 14,175-14,225 kHz on 20 m, etc.), could be split into two parts in proportions of either half and half or one thirds/two thirds, where Codeless Advanced Licenses would include full amateur privileges on only one third (or one half) of the bands and Advanced Code Licenses would include full privileges on all Advanced frequencies as they presently exist. The same would be true for General and Technician.

Perhaps the Extra Class license requirements could retain the 20 wpm code test. The appeal of getting this license would be for the hard core hams who think it's worth the extra effort to get exclusive privileges on additional bands, the way the licensing is presently set up.

It may also be a good idea to retain the 13-wpm code test for Advanced licensees, since it would give Advanced hams that want it a little bit more breathing room, but still allow room for General no-code licenses to exist (General no-codes would get half of the General frequencies, in this case). This might be a good idea, since many General class licensees only want HF privileges, and don't care about advancement or more exclusive privileges, whereas Advanced licensees want more exclusive privileges.

As far as code speed goes, it would be acceptable to me if code speed were lowered for some licenses. General and Advanced both could be lowered to 10 wpm, or General to 10 wpm and Advanced remain at 13 wpm. Extra could possibly be lowered to 15 wpm, but I would still prefer retaining 20 wpm. I am also in favor of the idea of replacing some code requirements with test elements, but with the provision of restricting license band access, as noted above.

I also approve of getting rid of the Novice class license and retaining only four classes of licenses, since there are so few applying for the Novice license now.

There are many possible combinations of arranging licenses and privileges, but my preference would be the following:

1. Codeless Technician: No code test required. Unrestricted access on all VHF and higher bands, as requirement presently exist.
2. Code Plus Technician: 5 wpm code test required. Unrestricted access on all VHF and higher bands. HF privileges already accorded Novice and Tech Plus licenses, as they presently exist.
3. Codeless General: No code test required. More questions on written test. All Codeless Technician privileges.

Unrestricted privileges on HF bands for one third of the space already accorded General licensees.

4. Code Plus General: 10 wpm code test required. No extra questions on written test. Unrestricted access on all General privileges, as they presently exist.
5. Codeless Advanced: No code test required. Extra written test questions. All Codeless Technician and Codeless General privileges. Unrestricted privileges on HF bands for one third of the space already accorded Advanced licensees.
6. Code Plus Advanced: 13 wpm code test required. No extra questions on written test. Unrestricted access on all Advanced privileges, as presently exist.

(Requirements for the General/Advanced licenses could be arranged in either of two ways: 1) Advanced License could remain a "code only" license at 10 or 13 wpm. General license would have a "code" and a "codeless" license option, with half of all General frequencies given to the Codeless General licensees. Present General licensees could upgrade to Advanced by taking the written test, if they felt uncomfortable with the new arrangement, or, 2) Advanced License could also include a codeless license option, with only one third of Advanced frequencies available to codeless licensees, and ADDITIONALLY, only one third (instead of one half) of the General bands would be given to Codeless General licensees.).

7. Extra: 20 wpm code test required, as it is now. Unrestricted access on all Extra privileges as they presently exist.

On other matters the FCC has invited comment on:

1. Require VEs to police medical waiver applicants for Morse Code test? : I am against this. Don't make VEs become the police authority any more than they have to.
2. Do away with Tech Plus license? : Keep it, as well as other code-less and -plus licenses, as above.
3. Go to a one- or two-tier Morse Code system? : Go to a four-tier system: Tech plus: 5 wpm, General plus: 10 wpm, Advanced plus: 13 wpm, Extra: 20 wpm.
4. Specify how VE testers administer Morse Code test? : Let them continue to determine for themselves how to administer their tests.